

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

CR18-40132

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

DAMON VINCENT JOBIN,

Defendant.

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The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

My name is Damon Vincent Jobin.

Beginning on or about February 2017 and continuing until on or about September 2017, I, along with at least one other person, reached an agreement or came to an understanding to distribute 100 grams or more of a mixture or substance containing a detectable amount of a fentanyl analogue, cyclopropyl fentanyl, in the District of South Dakota.

I voluntarily and intentionally joined in the agreement or understanding to distribute cyclopropyl fentanyl.

At the time I joined in the agreement or understanding to distribute cyclopropyl fentanyl, I knew the purpose of the agreement or understanding.

While I was actively involved in furthering the purpose of the agreement or understanding, I could foresee that the quantity of mixture or substance containing a detectable amount of cyclopropyl fentanyl exceeded 100 grams.

As part of my involvement in the conspiracy, I worked for a co-conspirator and manufactured pills that contained cyclopropyl fentanyl. My co-conspirator sold and marketed these pills on the Dark Web. I mailed several packages of pills containing cyclopropyl fentanyl to a drug customer in South Dakota who ordered pills from my co-conspirator on the Dark Web. The quantities of pills I mailed to South Dakota far exceeded what would be for personal use. I was therefore aware that the drug customers in South Dakota would likely be reselling a portion of the pills I mailed to them. I knew that these pills were intended for human consumption.

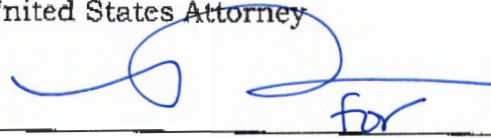
From on or about February 2017 and continuing until on or about September 2017, I, along with at least one other person, reached an agreement or came to an understanding to conduct financial transactions affecting interstate and foreign commerce by depositing proceeds from the conspiracy to distribute 100 grams or more of a mixture or substance containing a detectable amount of cyclopropyl fentanyl at financial institutions in the United States. I knew that these transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the cyclopropyl fentanyl conspiracy, and that while conducting

these financial transactions, I knew that the money involved in these transactions were the proceeds from the cyclopropyl fentanyl conspiracy.

As part of my involvement in the money laundering conspiracy, I allowed my co-conspirator to deposit proceeds from selling cyclopropyl fentanyl in South Dakota in my Bank of America checking account. None of the transactions exceeded \$10,000. My co-conspirator deposited the proceeds from the drug sales in this account to conceal the source of the proceeds and to avoid reporting requirements, all in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), (ii), and (h) and 21 U.S.C. §§ 841(a)(1) and 846.

The parties submit that the foregoing statement of facts is not intended to be a complete description of the offense or the Defendant's involvement in it. Instead, the statement is offered for the limited purpose of satisfying the requirements of Fed. R. Crim. P. 11(b)(3). The parties understand that additional information relevant to sentencing, including additional drug quantities, may be developed and attributed to the Defendant for sentencing purposes.

RONALD A. PARSONS, JR.  
United States Attorney



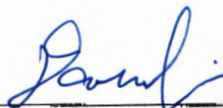
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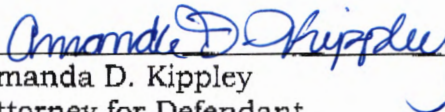
Date



Damon Vincent Jobin  
Defendant

June 12, 2020

Date



Amanda D. Kippely  
Attorney for Defendant